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14 *Representing the United States of America*

15
16 **UNITED STATES DISTRICT COURT**
17 **DISTRICT OF NEVADA**

18 **United States of America,**

19 Plaintiff,

20 v.

21 **Pastor Fausto Palafox,**
Albert Lopez,
22 **Albert Benjamin Perez,**
James Patrick Gillespie,
23 **Ernesto Manuel Gonzalez,**
Bradley Campos,

2:16-cr-00265-GMN-CWH

Stipulation to Continue Discovery Date
Under Fed. R. Crim. P.16(a)(1)(A)-(F)

**Cesar Morales, and
Diego Garcia**

Defendants.

The United States and defendants Pastor Fausto Palafox, Albert Lopez, Albert Benjamin Perez, James Patrick Gillespie, Ernesto Manuel Gonzalez, Bradley Campos, Cesar Morales, and Diego Garcia, by their undersigned counsels, stipulate to continue the date by which the Government must provide discovery disclosures pursuant to Fed.R.Crim.P. 16(a)(1)(A)-(F), *See* ECF 1448, from February 15, 2019, to March 1, 2019. This stipulation is entered into based on the following.

On February 8, 2019, the United States informed the defendants that, although it has been working diligently to produce discovery through Relativity (the program through which most of the discovery has been produced in this case and includes production bates numbers and an index), due to complexities inherent to Relativity, it could not produce discovery through Relativity by February 15, 2019, the deadline established in the January 15, 2019, status conference (*see* ECF No. 1448). The United States informed the defendants it can nevertheless meet its discovery production obligation by the February 15, 2019, deadline by producing discovery in a format outside of Relativity that would not include production bates numbers or an index. The Government informed counsel it would then produce a duplicate copy of discovery with production bates numbers and an index two weeks later – March 1, 2019. The Government asked the defendants if they would alternatively prefer to agree to a two-week continuance so they could receive the discovery only once, that is through Relativity. Each agreed.

1 Based on the foregoing, the parties ask the Court to accept this stipulation.

2 DATED this 11th day of February 2019.

3 Respectfully,

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United States Attorney

6 / s / Christopher Burton

7
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11 s/ Amy E.Jacks
12 AMY ELIZABETH JACKS
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/s/ Mark Fleming
MARK FLEMING
Counsel for Albert Lopez

13 s/ Andrea Luem
14 ANDREA LUEM
Counsel for Albert B. Perez

/s/ Jess Marchese
JESS MARCHESE
Counsel for James P. Gillespie

15 s/ Michael Kennedy
16 MICHAEL KENNEDY
Counsel for Ernesto Manuel Gonzalez

/s/ Marcia A. Morrissey
MARCIA A. MORRISSEY
Counsel for Bradley Michael Campos

17 s/Christopher Oram
18 CHRISTOPHER ORAM
Counsel for Cesar Vaquera Morales

/s/ Kathleen Bliss
KATHLEEN BLISS
Counsel for Diego Chavez Garcia

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 United States of America,
4

5 Plaintiff,

6 v.

7 Pastor Fausto Palafox,
8 Albert Lopez,
9 Albert Benjamin Perez,
10 James Patrick Gillespie,
11 Ernesto Manuel Gonzalez,
12 Bradley Campos,
13 Cesar Morales, and
14 Diego Garcia,

15 Defendants.

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**Order on Stipulation to Continue
Discovery Date Under Fed. R. Crim.
P.16(a)(1)(A)-(F)**

16 ORDER

17 **IT IS HEREBY ORDERED** that the discovery production date set forth in ECF
18 No. 1448 is continued from February 15, 2019 to March 1, 2019.

19 Dated February 15, 2019

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22 United States Magistrate Judge
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